

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**BRAD HARE and
MAMMOTH WEST CORPORATION,**

Defendants.

Civil No. 24-12134

Honorable Georgia N. Alexakis

**MOTION FOR APPROVAL AND ENTRY OF CONSENT
JUDGMENT AGAINST DEFENDANTS**

The Securities and Exchange Commission (“SEC”) and Defendants, Brad Hare, and Mammoth West Corporation, have reached a good faith settlement. Accordingly, the SEC moves for the approval and entry of Judgments as to both Defendants (“Proposed Judgments”), which are attached to this motion as Exhibit 1. In support of this motion the SEC states as follows:

1. The SEC filed its Complaint on November 25, 2024. ECF No. 1. The Complaint alleges that Defendants engaged in conduct that violated federal securities laws.
2. The SEC and Defendants have agreed to a settlement of the claims against Defendants, and to the entry of the Proposed Judgments. Defendants’ Consents, in which they agree to the entry of the Proposed Judgments, are attached as Exhibit 2.

3. The Proposed Judgment for Hare would: (1) permanently enjoin Hare from violating provisions of the federal securities laws alleged in the Complaint; (2) bar Hare from participating in an offering of penny stock for a period of five years, and (3) find Hare liable for disgorgement in the amount of \$438,932.

4. The Proposed Judgment for Mammoth would: (1) permanently enjoin Mammoth from violating provisions of the federal securities laws alleged in the complaint; (2) bar Mammoth from participating in an offering of penny stock for a period of five years; (3) find Mammoth liable for disgorgement in the amount of \$2,734,810. The Proposed Judgment also requires Mammoth to surrender for cancellation all shares of common stock, unexercised warrants, and conversion rights associated with the issuers identified in Appendix A to the Complaint.

5. Entry of the Proposed Judgments will further the interest of justice and promote judicial economy by eliminating the need for a trial of Defendants and resolving all outstanding claims against Defendants.

Accordingly, the SEC respectfully requests that the Court: (i) grant this agreed motion; (ii) enter the Proposed Judgements by consent against Defendants; and (iii) award such other and further relief as this Court deems just.

Date: November 26, 2024

Respectfully submitted,

/s/ P. Davis Oliver (Pro Hac Vice pending)

James M. Carlson (IL Bar No. 6269506)

P. Davis Oliver (DC Bar No. 490620)

SECURITIES AND EXCHANGE COMMISSION

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*Counsel for Plaintiff Securities and Exchange
Commission*

CERTIFICATE OF SERVICE

I certify that on November 26, 2025, a true and correct copy of the foregoing document was filed electronically through the Court's CM/ECF system, which will send copies to all counsel of record.

/s/ P. Davis Oliver (Pro Hac Vice pending)

P. Davis Oliver

*Counsel for Plaintiff United States Securities
and Exchange Commission*